

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

FULL CIRCLE UNITED, LLC,

Plaintiff,

v.

BAY TEK ENTERTAINMENT, INC.,

Defendant.

Civ. Action No. 1:20-cv-03395

BAY TEK ENTERTAINMENT, INC.,

Counterclaim Plaintiff,

v.

FULL CIRCLE UNITED, LLC,

Counterclaim Defendant,

and

ERIC PAVONY,

Additional Counterclaim  
Defendant.

**SUPPLEMENTAL DECLARATION OF PAUL THANASIDES**

I, Paul Thanasides, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am a Partner in the law firm McIntyre Thanasides Bringgold Elliott Grimaldi Guito & Matthews, P.A. (the “McIntyre Firm”), which is counsel for Plaintiff/Counterclaim

Defendant Full Circle United, LLC (“FCU”) and Counterclaim Defendant Eric Pavony (“Pavony”) in the above-captioned matter. I make the following statements based on my own personal knowledge.

**Audiovisual Exhibits Being Lodged with the Court**

2. Annexed hereto as **Video Exhibit 1**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000006 (Recording of phone call between Holly Hampton, Eric Pavony, and Eric Wikman).

3. Annexed hereto as **Video Exhibit 2**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000015 (Recording of phone call between Gaetan Philippon and Eric Pavony on December 18, 2015).

4. Annexed hereto as **Video Exhibit 3**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000081 (April 14, 2016 Recording of Meeting between Bay Tek and FCU and presentation by FCU)

5. Annexed hereto as **Video Exhibit 4**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000105 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

6. Annexed hereto as **Video Exhibit 5**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000106 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

7. Annexed hereto as **Video Exhibit 6**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000107 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

8. Annexed hereto as **Video Exhibit 7**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000108 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

9. Annexed hereto as **Video Exhibit 8**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000109 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

10. Annexed hereto as **Video Exhibit 9**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000110 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

11. Annexed hereto as **Video Exhibit 10**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000111 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

12. Annexed hereto as **Video Exhibit 11**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000112 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

13. Annexed hereto as **Video Exhibit 12**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000113 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

14. Annexed hereto as **Video Exhibit 13**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000114 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

15. Annexed hereto as **Video Exhibit 14**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000115 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

16. Annexed hereto as **Video Exhibit 15**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000116 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

17. Annexed hereto as **Video Exhibit 16**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000117 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

18. Annexed hereto as **Video Exhibit 17**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000118 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

19. Annexed hereto as **Video Exhibit 18**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000119 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

20. Annexed hereto as **Video Exhibit 19**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000120 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

21. Annexed hereto as **Video Exhibit 20**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000121 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

22. Annexed hereto as **Video Exhibit 21**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000122 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

23. Annexed hereto as **Video Exhibit 22**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000123 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

24. Annexed hereto as **Video Exhibit 23**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000124 (Recording of FCU Presentation to Bay Tek Leadership Team on April 14, 2016).

25. Annexed hereto as **Video Exhibit 24**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000129 (Recording of FCU Presentation to Bay Tek Leadership Team on April 15, 2016).

26. Annexed hereto as **Video Exhibit 25**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000010114 (Recording of phone call between Gaetan Philippon, Eric Pavony and Eric Wikman on September 29, 2018).

27. Annexed hereto as **Video Exhibit 26**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000010115 (Recording of phone call between Gaetan Philippon, Eric Pavony and Eric Wikman on September 29, 2018).

28. Annexed hereto as **Video Exhibit 27**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000010116 (Recording of phone call between Gaetan Philippon, Eric Pavony and Eric Wikman on September 29, 2018).

29. Annexed hereto as **Video Exhibit 28**, being lodged with the Court under separate cover, is a true and correct copy of a video marked as Exhibit 14 at the Deposition of Holly

Hampton and bearing Bates number FCU000020478 (Roll for Ohio Skee-Ball Tournament Promotional Video).

30. Annexed hereto as **Video Exhibit 29**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000007214 (Recording of phone call between Eric Pavony and Joe Sladek of SBI on November 25, 2015).

31. Annexed hereto as **Video Exhibit 30**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000010124 (Recording of phone call between Eric Pavony and George Petro on August 1, 2018).

32. Annexed hereto as **Video Exhibit 31**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000183 (Recording of diner meeting between FCU and Bay Tek including Eric Pavony, Eric Wikman, Eric Cooper, Larry Treankler, Bob Rupp, and Ryan Cravens, on September 6, 2017).

33. Annexed hereto as **Video Exhibit 32**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000000008 (Recording of meeting between FCU and Bay Tek including Eric Pavony, and Larry Treankler, on January 17, 2019).

34. Annexed hereto as **Video Exhibit 33**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000020722 (Promotional video for “2019 Skee-ball World Championship” at Ed’s Funcade).

35. Annexed hereto as **Video Exhibit 34**, being lodged with the Court under separate cover, is a true and correct copy of a video bearing Bates FCU000020738 (FCU promotional video featuring Brodie Smith).

### **Spreadsheet Exhibits Being Lodged with the Court**

36. Annexed hereto as **Exhibit 1**, being lodged with the Court under separate cover, is a true and correct copy of a spreadsheet bearing Bates BT0006861.

37. Annexed hereto as **Exhibit 2**, being lodged with the Court under separate cover, is a true and correct copy of a spreadsheet bearing Bates FCU\_EXPERT\_0000376 (List of NSBL Users).

38. Annexed hereto as **Exhibit 3**, being lodged with the Court under separate cover, is a true and correct copy of a spreadsheet marked as Exhibit 23 at the Deposition of Eric Wikman, bearing Bates FCU\_EXPERT\_0000966.

### **The License Agreement**

39. Annexed hereto as **Exhibit 4**, is a true and correct copy of the July 17, 2014 Confidential Trademark License Agreement.

### **The Settlement Agreement**

40. Annexed hereto as **Exhibit 5**, is a true and correct copy of the July 17, 2014 Confidential Settlement Agreement.

### **Deposition Testimony**

41. Annexed hereto as **Exhibit 6**, are true and correct copies of pages excerpted from the transcript of the Deposition of Counterclaim Defendant Eric Pavony, in his individual capacity and as designated representative of Plaintiff/Counterclaim Defendant Full Circle United, LLC (“FCU”), taken in this matter on July 13-14, 2022.

42. Annexed hereto as **Exhibit 7**, are true and correct copies of pages excerpted from the transcript of the Deposition of Eric Wikman, in his individual capacity and as designated

representative of Plaintiff/Counterclaim Defendant Full Circle United, LLC (“FCU”), taken in this matter on May 25-26.

43. Annexed hereto as **Exhibit 8**, are true and correct copies of pages excerpted from the transcript of the Deposition of Eric Cooper taken in this matter on June 6, 2022 and June 8, 2022.

44. Annexed hereto as **Exhibit 9**, are true and correct copies of pages excerpted from the transcript of the Deposition of Laura Smith taken in this matter on July 6, 2022.

45. Annexed hereto as **Exhibit 10**, are true and correct copies of pages excerpted from the transcript of the Deposition of Holly Hampton, in her individual capacity and as designated representative of Bay Tek, taken in this matter on June 20, 22, and 30, 2022.

46. Annexed hereto as **Exhibit 11**, are true and correct copies of pages excerpted from the transcript of the Deposition of Larry Treankler taken in this matter on July 12, 2022

47. Annexed hereto as **Exhibit 12**, are true and correct copies of pages excerpted from the transcript of the Deposition of Pat Scanlan taken in this matter on March 3, 2022.

48. Annexed hereto as **Exhibit 13**, are true and correct copies of pages excerpted from the transcript of the Deposition of Ryan Cravens taken in this matter on March 4, 2022.

49. Annexed hereto as **Exhibit 14**, are true and correct copies of pages excerpted from the transcript of the Deposition of Gaetan Philppon taken in this matter on March 10, 2022.

50. Annexed hereto as **Exhibit 15**, are true and correct copies of pages excerpted from the transcript of the Deposition of George Petro taken in this matter on January 21, 2022.

51. Annexed hereto as **Exhibit 16**, are true and correct copies of pages excerpted from the transcript of the Deposition of Rick Rochetti taken in this matter on May 13, 2022.



### **Deposition Exhibits**

52. Annexed hereto as **Exhibit 17**, is a true and correct copy of a document marked as Exhibit 3 at the Deposition of Holly Hampton, bearing Bates numbers BT0002178 - BT0002195

53. Annexed hereto as **Exhibit 18**, is a true and correct copy of a document marked as Exhibit 4 at the Deposition of Holly Hampton, bearing Bates numbers BT0007559 – BT0007567.

54. Annexed hereto as **Exhibit 19**, is a true and correct copy of a document marked as Exhibit 5 at the Deposition of Holly Hampton, bearing Bates numbers BT0004430 – BT0004445.

55. Annexed hereto as **Exhibit 20**, is a true and correct copy of a document marked as Exhibit 15 at the Deposition of Holly Hampton.

56. Annexed hereto as **Exhibit 21**, is a true and correct copy of a document marked as Exhibit 19 at the Deposition of Holly Hampton, bearing Bates numbers BT0010333 – BT0010351.

57. Annexed hereto as **Exhibit 22**, is a true and correct copy of a document marked as Exhibit 9 at the Deposition of Rick Rochetti.

58. Annexed hereto as **Exhibit 23**, is a true and correct copy of a document marked as Exhibit 6 at the Deposition of Ryan Cravens, bearing Bates numbers BT0002443 – BT0002444.

59. Annexed hereto as **Exhibit 24**, is a true and correct copy of a document marked as Exhibit 7 at the Deposition of Ryan Cravens, bearing Bates numbers BT0002527 – BT0002528.

60. Annexed hereto as **Exhibit 25**, is a true and correct copy of a document marked as Exhibit 40 at the Deposition of Gaetan Philippon, bearing Bates numbers BT0004372 – BT0004392.

61. Annexed hereto as **Exhibit 26**, is a true and correct copy of a document marked as Exhibit 44 at the Deposition of Gaetan Philippon, bearing Bates numbers BT0007576 – BT0007577.

62. Annexed hereto as **Exhibit 27**, is a true and correct copy of a document marked as Exhibit 10 at the Deposition of George Petro, bearing Bates numbers GP-0073.

63. Annexed hereto as **Exhibit 28**, is a true and correct copy of a document marked as Exhibit 12 at the Deposition of George Petro.

**Documents Produced by FCU**

64. Annexed hereto as **Exhibit 29**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000000048- FCU000000051.

65. Annexed hereto as **Exhibit 30**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000000960.

66. Annexed hereto as **Exhibit 31**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000002782

67. Annexed hereto as **Exhibit 32**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000002955 - FCU000002957.

68. Annexed hereto as **Exhibit 33**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000003046.

69. Annexed hereto as **Exhibit 34**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000003049.

70. Annexed hereto as **Exhibit 35**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000004788

71. Annexed hereto as **Exhibit 36**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000004789- FCU000004790.

72. Annexed hereto as **Exhibit 37**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000004948-FCU000004953

73. Annexed hereto as **Exhibit 38**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000005214

74. Annexed hereto as **Exhibit 39**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000005247 - FCU000005299.

75. Annexed hereto as **Exhibit 40**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000005553-FCU000005554

76. Annexed hereto as **Exhibit 41**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000005631-FCU000005634

77. Annexed hereto as **Exhibit 42**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000007225-FCU000007227

78. Annexed hereto as **Exhibit 43**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000007658

79. Annexed hereto as **Exhibit 44**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000009929-FCU000009936

80. Annexed hereto as **Exhibit 45**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000015160 - FCU000015161

81. Annexed hereto as **Exhibit 46**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000018185

82. Annexed hereto as **Exhibit 47**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020292.

83. Annexed hereto as **Exhibit 48**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020715

84. Annexed hereto as **Exhibit 49**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020716

85. Annexed hereto as **Exhibit 50**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020717

86. Annexed hereto as **Exhibit 51**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020718

87. Annexed hereto as **Exhibit 52**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020719

88. Annexed hereto as **Exhibit 53**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020720

89. Annexed hereto as **Exhibit 54**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020721

90. Annexed hereto as **Exhibit 55**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020723

91. Annexed hereto as **Exhibit 56**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020724

92. Annexed hereto as **Exhibit 57**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020734

93. Annexed hereto as **Exhibit 58**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020736

94. Annexed hereto as **Exhibit 59**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020739

95. Annexed hereto as **Exhibit 60**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020743

96. Annexed hereto as **Exhibit 61**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020747

97. Annexed hereto as **Exhibit 62**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020789

98. Annexed hereto as **Exhibit 63**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020793

99. Annexed hereto as **Exhibit 64**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020794

100. Annexed hereto as **Exhibit 65**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020795

101. Annexed hereto as **Exhibit 66**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020796

102. Annexed hereto as **Exhibit 67**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020797

103. Annexed hereto as **Exhibit 68**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020800

104. Annexed hereto as **Exhibit 69**, is a true and correct copy of a document produced by Plaintiff and Counterclaim Defendant FCU, bearing Bates FCU000020805

**Documents Produced by Bay Tek**

105. Annexed hereto as **Exhibit 70**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0000307-BT0000324.

106. Annexed hereto as **Exhibit 71**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0002168.

107. Annexed hereto as **Exhibit 72**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0002592-BT0002593

108. Annexed hereto as **Exhibit 73**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0005628 - BT0005629.

109. Annexed hereto as **Exhibit 74**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0005911-5912

110. Annexed hereto as **Exhibit 75**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0006063 - BT0006065.

111. Annexed hereto as **Exhibit 76**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0006710.

112. Annexed hereto as **Exhibit 77**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0007589-BT0007590

113. Annexed hereto as **Exhibit 78**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0007782-BT0007783

114. Annexed hereto as **Exhibit 79**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0008171-BT0008172

115. Annexed hereto as **Exhibit 80**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0008228-BT0008230

116. Annexed hereto as **Exhibit 81**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0009178 - BT0009182

117. Annexed hereto as **Exhibit 82**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0009225.

118. Annexed hereto as **Exhibit 83**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0010334-BT0010351

119. Annexed hereto as **Exhibit 84**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0010781-BT0010855.

120. Annexed hereto as **Exhibit 85**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0007813.

121. Annexed hereto as **Exhibit 86**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0006805-BT0006808

122. Annexed hereto as **Exhibit 87**, is a true and correct copy of a document produced by Defendant and Counterclaim Plaintiff Bay Tek, bearing Bates BT0010227-BT0010228

#### **Documents Produced by George Petro**

123. Annexed hereto as **Exhibit 88**, is a true and correct copy of a document produced by third-party George Petro, bearing Bates GP-1697 - GP-1698.

#### **Declarations and Affidavits**

124. Annexed hereto as **Exhibit 89**, is a true and correct copy of the Affidavit of Blaine Graboyes Goldman executed on March 13, 2023.

125. Annexed hereto as **Exhibit 90**, is a true and correct copy of the Declaration of Eric Pavony (Dkt. 45) executed on October 28, 2020.

126. Annexed hereto as **Exhibit 91**, is a true and correct copy of the Declaration of Eric Pavony executed on March 22, 2023.

### **Expert Reports**

127. Annexed hereto as **Exhibit 92**, is a true and correct copy of the Expert Report of FCU's expert Laura Smith dated July 28, 2021.

128. Annexed hereto as **Exhibit 93**, is a true and correct copy of the Reply Expert Report of FCU's expert Laura Smith dated October 4, 2021.

### **Discovery Responses**

129. Annexed hereto as **Exhibit 94**, is a true and correct copy of FCU's Answers to Bay Tek's First Set of Interrogatories, served on October 26, 2020.

130. Annexed hereto as **Exhibit 95**, is a true and correct copy of Bay Tek's Response to FCU's and Eric Pavony's First Set of Requests for Admissions served on November 20, 2020.

131. Annexed hereto as **Exhibit 96**, is a true and correct copy of Bay Tek's Second Amended Response to FCU's Second Set of Interrogatories, served on October 15, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22<sup>nd</sup> day of March 2023

/s/ Paul Thanasides  
Paul Thanasides